



P.O. Box 1267, Hanford, California 93232
www.CaliforniaWaterAlliance.org

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Water Use Efficiency Branch
SB X7-7 Program
P.O. Box 942836
Sacramento, CA 94236-0001

RE: Draft Report to the Legislature Quantifying the Efficiency of Agricultural Water Use

To Whom It May Concern:

On behalf of the California Water Alliance Board of Directors, I am writing today to provide our comments on the *Draft Report to the Legislature Quantifying the Efficiency of Agricultural Water Use* (Draft Report). This report is a great opportunity to provide the Legislature with an overview of the methods that can be used to quantify efficient water management. We greatly appreciate this opportunity to contribute our opinion. It is imperative to California's water future that this report contains the most reliable information needed by the Legislature to make well informed, reasonable decisions regarding future legislation which directly impacts the State's budget, agricultural community, and future economic security.

Recognizing the goal mentioned above we submit our comments on the Draft Report below.

- It is our opinion that the Draft includes speculative implementation deadlines that are not practical; assuming that funding and data development will occur on such a schedule works at odds with the ultimate goal of providing the Legislature, DWR, and regulated entities with the absolute highest quality report. By dividing the implementation portion into phases, separating that which can be completed with current programs and funding and that which DWR must acquire additional funding (including estimated cost per project), the report has become more defined than the previous draft. However, portions of the report are still difficult to understand; what work is able to be conducted through current programs, what will require additional resources and/or data collection & reporting, specific times, and estimated costs requires further explanation. We encourage the Department to continue to clarify the activities, costs, and points of competition for each phase as a means of improving transparency and communication among interested parties.
- As it is currently written, readers can interpret the report as stating that DWR is able to require the submission of data from all water users. To clarify, the report must conclusively provide a description of which entities would be providing data, which will be required to submit Agricultural Water Management Plans, and whether or not regional plans and Bureau of Reclamation approved plans provide the data necessary to implement water supplier scale quantification.
- We commend the Department for including in the latest Draft an online method for the distribution of information in both the description of implementation as well as the cost estimate. Transparency is essential to the success and credibility of any information gathering

program developed. Establishing an online reporting procedure and program that will provide easily accessible information to any interested party will give greater value to the information gathered, oversee monitoring & management practices in real time, and facilitate communication and supervision of participating departments.

- In the most recent draft of the report, we appreciate the distinction that Productivity Indicators “do not quantify the efficiency of agricultural water use...that these indicators not be used to draw conclusions about regional crop selection.” While we are in agreement that such indicators cannot be used to quantify agricultural water use, rather a description of productivity indicators in the report best serves as a reference for Legislators. The directive of SBX7-7 is “to develop and report to the Legislature a proposed methodology for quantifying the efficiency of agricultural water use, as well as a plan of implementation...” As such, productivity indicators should not be included in the methodology section of the report, nor should there be a plan and cost estimate for their implementation.

Thank you for considering our comments to the Draft Report, and will gladly help facilitate dialogue to further perfect this report among affected parties. It is our since hope that these recommendations will assist DWR in crafting a final report that complies with the legislative mandate while providing clear, direct, unbiased guidance to the Legislature. As the next generation of agricultural water leaders, the California Water Alliance will continue to be a solution-based voice that advocates for short and long term solutions that take into consideration the needs of California’s agricultural community, cities, businesses, and the environment. We look forward to any opportunity to create real and lasting solutions to California’s water challenges.

Sincerely,



Aubrey J. D. Bettencourt
Executive Director
California Water Alliance
Aubrey@CaliforniaWaterAlliance.org
c. 559.816.8691